

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

ORIGINAL
FILE

In the Matter of)
Administration of the)
North American Numbering Plan)

DA 91-1307

DEC 23 7 50 AM '91

INDUSTRY ANALYSIS

COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company (SWBT) acknowledges that the Petition filed by the National Association of Regulatory Utility Commissioners (NARUC) for a Notice of Inquiry (NOI), concerning the administration of the North American Numbering Plan (NANP), raises numerous complex industry issues. While SWBT concurs that these issues are important both to customers and regulators, SWBT does not believe that a full investigation by the Commission is warranted. Many of the issues raised in the NARUC Petition have been, are being, or are scheduled to be addressed in other industry forums.

For example, the petition acknowledges the involvement of the Industry Carriers Compatibility Forum (ICCF) in many numbering issues, such as Numbering Plan Area (NPA) codes, Carrier Identification Codes (CICs), Automatic Number Identification (ANI), Information digits, and Signaling System 7 (SS7) point codes. The level of involvement of the ICCF in these issues is much deeper and much more productive than the Petition indicates, and is not limited solely to the establishment of administrative guidelines for the allocation of these different codes.

In the case of CIC expansion, for example, the ICCF has sponsored industry-wide meetings chaired by the NANP administration. These workshops resulted in industry consensus on

a detailed plan for expansion of the CIC resource. ICCF sponsored work groups examined not only Assignment Guidelines for CICs, but also Reclamation of CICs and Technical Alternatives for CICs.

The Petition requests the "examination of equitable plans for assigning NANP codes among the competing interests such as the Bell Operating Companies, the Independent Operating Companies, the Interexchange Carriers, the Enhanced Service Providers, Cellular Mobile Carriers, and emerging PCS providers."¹ On June 21, 1991, the FCC suggested that the NANP "take the lead in the development of guidelines and standards for the assignment and reservation of central office codes."² In compliance with that recommendation, the NANP issued a request, for input, to the industry on October 7, 1991. According to the schedule presented at ICCF #24 in Nashville, the NANP intends to deliver a strawman document to the industry on or about February 15, 1992, hold industry meetings beginning in March 1992 (lasting approximately four months), and then forward any unresolved issues to the FCC by July 1, 1992.

Concerning the allocation of NPA codes, at ICCF #23 in Rochester, N.Y., the NANP administration announced its intention to release the Long Term Numbering Plan (LTNP) in the first half of 1992 for a review and consensus process within the industry. This plan will contain information on the allocation of NPA codes after 1995. The plan is currently scheduled to be revised and published in the second half of 1992.

¹Petition, p. 6.

²June 21, 1991, Letter from Richard M. Firestone to Thomas A. Saunders, Vice-President, Operations Technology, Bell Communications Research.

Discussions have also taken place at ICCF concerning Interchangeable Numbering Plan Area (INPA) codes. On July 18, 1991, at ICCF #23, a representative from the NANP administration presented a "Tutorial on NPA Exhaust," in which INPAs were discussed at length. Should an industry participant have concerns regarding the technical aspects of the NANP's plan for implementation of INPAs, such concerns should be addressed in this forum, which is attended regularly by the NANP, IXCs, LECs and vendors.

SWBT believes, in short, that there are established industry forums to examine the technical and administrative issues and alternatives concerned with numbering issues, and that those issues should be resolved to the extent possible within the telecommunications industry before assistance is sought in the regulatory arena.

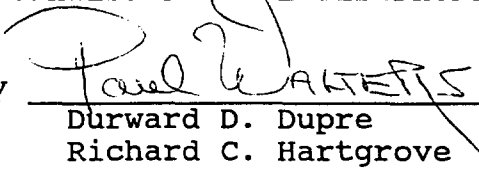
The Petition also requests examination of "costs to the telephone companies and the ratepayers . . ." related not only to INPAs but also to all numbering issues, and of ". . . costs that may be appropriately allocated to a telecommunications service that consumes a limited resource, such as telephone number or CIC code." SWBT supports this element of the NARUC's Petition. SWBT believes that LECs do not have adequate means, under existing rules, to recover the costs associated with required network Numbering changes. SWBT supports the exploration of a new rate recovery scheme to address the costs associated with the implementation of various numbering changes.

Should the FCC choose to proceed with an NOI, the focus should be narrow, including only regulatory issues such as cost recovery and allocation of costs. The FCC should note that a full proceeding to look at all aspects of numbering, including technical alternatives, at this time could harm the telecommunications infrastructure. This is especially true, for example, in the areas of CIC expansion and INPA codes. Because of the remaining limited quantity of both CICs and NPAs, and the time required both for planning and implementation to accommodate changes, a delay in the deployment of industry adopted plans, while the FCC examines alternatives, could create a hiatus in new provisioning of services that utilize these codes and would, therefore, be detrimental to all users of the Public Switched Network.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

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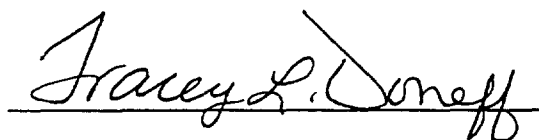
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December 20, 1991

CERTIFICATE OF SERVICE

I, Tracey L. Doneff, hereby certify that the foregoing "Comments of Southwestern Bell Telephone Company" in the Matter of Administration of the North American Numbering Plan (DA 91-1307) has been served this 20th day of December to the Parties of Record.


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December 20, 1991

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